

1 DAVID L. ANDERSON (CABN 149604)  
United States Attorney

2 HALLIE HOFFMAN (CABN 210020)  
3 Chief, Criminal Division

4 BENJAMIN KINGSLEY (CABN 314192)  
Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055  
6 San Francisco, California 94102-3495  
7 Telephone: (415) 436-6937  
8 FAX: (415) 436-7234  
Benjamin.Kingsley@usdoj.gov

9 Attorneys for the United States of America

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 DONALD MACCORD,

17 Defendant.  
18

RECEIVED

MAR 26 2019

SUSAN Y. SOONG *sm*  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

FILED

MAR 26 2019

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

19 The United States, by its undersigned counsel, and defendant, by his undersigned counsel,  
20 hereby stipulate and agree to the following:

21 Because defendant was cooperating, the plea agreement in this case was originally filed under  
22 seal and sentencing was scheduled to be conducted under seal. Defendant's cooperation has completed  
23 and the parties agree that further sealing is unnecessary. The parties thus jointly request that the plea

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STIPULATION TO UNSEAL AND [~~PROPOSED~~] ORDER

1 agreement dated September 11, 2018, be unsealed, and that the sentencing hearing be unsealed as well.

2 IT IS SO STIPULATED.

3 DATED: March 26, 2018

  
BENJAMIN KINGSLEY  
Assistant United States Attorney

  
MARK GOLDROSEN  
Counsel for Defendant Donald MacCord

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**[PROPOSED] ORDER**

Based upon the foregoing request, the Court hereby **ORDERS** that the plea agreement dated September 11, 2018, be unsealed, and that the sentencing hearing in this case be unsealed.

DATED: March 2, 2019

  
\_\_\_\_\_  
HON. WILLIAM ALSUP  
UNITED STATES DISTRICT JUDGE

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA

3  
4 USA,

5 Plaintiffs,

6 v.

7 DONALD MACCORD,

8 Defendants.

Case No.: 17-cr-00592-WHA-1

**CERTIFICATE OF SERVICE**

9  
10 I, the undersigned, hereby certify that:


- 11 (1) I am an employee in the Office of the Clerk, U.S. District Court, Northern District of  
12 California; and
- 13 (2) On 3/26/2019, I SERVED a true and correct copy(ies) of the attached, by placing said  
14 copy(ies) in a postage paid envelope addressed to the person(s) hereinafter listed, by  
15 depositing said envelope in the U.S. Mail, or by placing said copy(ies) into an  
interoffice delivery receptacle located in the Clerk's office.

16 Benjamin Kingsley  
17 United States Attorney's Office Criminal Division  
450 Golden Gate Ave  
11th Floor  
18 San Francisco, CA 94102

19 Mark Stuart Goldrosen  
20 Law Offices of Mark S. Goldrosen  
255 Kansas Street  
Suite 340  
21 San Francisco, CA 94103

22 Dated: 3/26/2019

23  
24 Susan Y. Soong  
Clerk, United States District Court

25  
26 By:   
Theresa Hoang, Deputy Clerk to  
27 the Honorable William Alsup  
28